

EXHIBIT 73

[Filed Under Seal]

From: Daugherty, Ashley
Sent: Tuesday, August 25, 2015 1:45 PM
To: Craddock, Scott
Subject: 2015 AMI Observations and Responses - Chart including all facility reports
Attachments: 2015 AMI Observations and Responses.rtf

Scott, For your review.

ETHICS AND COMPLIANCE

AMI'S 2015 FACILITY-BASED OBSERVATIONS AND RECOMMENDATIONS + RESPONSES THERETO

Facility	Concern or Achievement	AMI's Observation	Report Citation	Response / Action Steps
General <i>(either not facility-specific or shared across facilities)</i>	Staff ignorance of Helpline	"some reported that they were not aware of it; some indicated that they were not sure about the anonymity of the hotline and still others voiced concerns that even if they reported something, nothing would result."	Houston - p. 5	Ethics Office: Launch of new Helpline and related CCA-wide education in 2016
		"not everyone knew about the CCA Helpline, nor did they know who would answer the phone... staff consistently questioned whether it was anonymous"	Adams – p. 8	
		"not everyone was aware of the hotline"	Bartlett – p. 7	
		Some staff believed "that all Helpline calls get back to the Warden," and some fear retaliation "since telephone calls 'are tracked.'"	Florence – p. 7	
		"Those who were aware of the Hotline did not believe it was truly anonymous."	Hardeman – p. 7	
		"not everyone knew about the CCA Helpline, who takes the calls or what happens to them"	Lake Erie – p. 8	

	Unreliability of Engagement Survey	<p>Fear of saying "something negative" because survey is "linked to individual email addresses"</p> <p>"some felt a subtle pressure to respond positively as supervisor stand directly over them"</p> <p>Not clear how to answer question referring to "supervisors"—which supervisor</p>	<p>Houston – p. 5</p> <p>Houston – p. 5</p> <p>Florence p. 7</p>	S.Kaiser to evaluate.
	Staff ignorance of Code of Conduct and Ethics Office	<p>"very few have read the Code."</p> <p>"most had not actually read the Code"</p> <p>Inconsistent awareness of the Code of Conduct</p> <p>"none of the staff...had actually read the Code of Conduct."</p> <p>"Staff were familiar with the Code of Conduct," but "depth of knowledge about the Code, as it applies to required staff behavior, could be improved."</p> <p>No officer "was familiar with" the CECO.</p> <p>COs "did not know that the company had an Ethics Officer."</p> <p>"Very few [COs]...knew who the company's ethics officer is."</p> <p>COs "did not know that the company had an Ethics Officer."</p>	<p>Houston – p. 5</p> <p>Florence – p. 8</p> <p>Hardeman – p. 8</p> <p>Lake Erie – p. 8</p> <p>Adams – p. 8</p> <p>Houston – p. 5</p> <p>Adams – p. 8</p> <p>Bartlett – p. 11</p>	Ethics Office: New Code roll-out in 2016, + 2015-2016 increase in communications with Ethics Office (e.g., ethics liaisons, ethics briefs, facility visits and trainings).

		"Most leaders and office staff...were aware of the [CECO], but...not... the [COs]."	Hardeman – p. 8 Lake Erie – p. 8 Florence p. 9	
	Language barrier between English-speaking staff and Spanish-speaking detainees and inmates	"Approximately 75 percent of the inmates do not speak English and are Spanish speaking... there are only 4... staff who speak Spanish." *Using other inmates as interpreters, and staff who have other responsibilities (medical) "Need more bi-lingual employees or Spanish classes" Lack of financial incentive for staff to learn Spanish.	Adams – p. 8 Adams – p. 8 Houston – p. 6 Adams – p. 8	HR + Ops. to evaluate and address
	Security staff work 12 hours shifts, with little or no breaks.	"12 hour shift, with no break" "Most of the corrections officers work 12-hour shifts, with no break." "staff only are permitted one 20 minute break during their 12 hour shift" "most of the [COs] noted that they do not	Adams – p. 3 Bartlett – p. 2, 9 Houston – p. 4 Lake Erie –	Ethics Office will inquire with Legal and HR.

		get breaks during those twelve hour shifts"	p. 4	
Adams	Weak correctional staff composition	<p>"very high turnover rate"</p> <p>"many new hires who lack Corrections experience"</p> <p>"in addition to being young...it is their first full time employment and they are being asked to work additional hours"</p> <p>"high turnover rate is an impediment to developing a strong culture"</p> <p>"many [COs] lack the personal maturity, a disciplined work ethic and the responsibility required"</p> <p>"critical that the facility have a strong pre-service and on-the-job training program to train the new hires in the CCA Way."</p> <p>"a strong mentoring program at Adams would help..."</p>	Adams p. 2-3, 5	HR + Ops. (Keith Hall/Mike Nalley) to evaluate and address
	Low staff morale; they feel overworked, disrespected, and unappreciated	<p>"inexperienced, overworked staff, who feel disrespected and looked down upon by leadership and feel that the enforcement of rules is too severe"</p> <p>"feel disrespected...supervisors are condescending" and sometimes "verbally</p>	Adams p. 2-7	<p>HR + Ops. (Keith Hall / Mike Nalley) to evaluate and address</p> <p>Additionally, Ethics Office to address "respect" in future communications and trainings (CCA-wide)</p>

		<p>abusive"</p> <p>"officers felt like they were being aggressively cited for simple mistakes and that the number of terminations for non-serious infractions had risen... work environment had become unstable and therefore, Adams was not a good place to work."</p> <p>"holding the new [COs] accountable for every deficiency as they learn the job may be having the unintended consequence of discouraging..."</p> <p>"work schedules, overtime, and hold over demands"</p> <p>"leading to staff 'burn out' and a deep sense of apathy"</p> <p>"staff feel unappreciated," even with small things such as lack of coffee and worn uniforms</p> <p>"those who are staying, they are disgruntled and bitter"</p> <p>"lack of respect and appreciation... emanate[d] most often from the Captains and Sergeants"</p>		
	Pay inequity	The fact that experienced officers "receive	Adams p. 4	HR + Ops to evaluate and address

		the same hourly rate as the new hires is having a dramatically negative impact on them"		
	Staff fear retaliation	"The overwhelming feedback...from the [COs], in particular, is that they fear that they will be retaliated against if they raise any issue, report any concern, or identify any suspicious behavior to a supervisor." "Some offered instances where they were retaliated against either subtly or directly"	Adams p. 4	Ethics Office address as CCA-wide education in 2016. Ethics Office also directly address with new Warden and Keith Hall. <i>Ethics Office working on more robust non-retaliation policy?</i>
	Lack of confidentiality discourages communication and reporting	Staff "believe they are not able to speak confidentially with their supervisors and whatever they say will be broadcast through the facility" "they felt there was no confidentiality when speaking with management"	Adams p. 4 p. 6	Ops. to address with facility leaders. Ethics Office also address CCA-wide in future communication.
	Lack of communication between leadership and officers, and officers and leadership	"there is no two way communication channel" COs "are only communicating with each other and not upward," and their conversations "are not positive." Managers were unaware of COs' "widespread complaints regarding a lack of respect and abusive behavior."	Adams p. 6-7	HR + Ops to evaluate and address

		<p>Leadership did not realize or effectively address rumor regarding future of the facility.</p> <p>Leadership needs to engage COs in small groups, and "build more personal relationships between managers" and COs, and "develop greater trust"</p>		
	Leadership deficiencies	<p>Facility's leaders may lack "leadership, supervisory and communication skills"</p> <p>Training could be very beneficial. "offer them models for strong leadership skills, including communication, team building, ethics and empathy"</p>	Adams p. 7	HR – CCA University?
	Staff safety concern	"because of staffing shortages, there is only one person running a unit. Some feel unsafe...[COs] suggested that additional staff on duty would be helpful, as would more radios."	Adams – p. 9	Ops – Keith Hall to evaluate and address.

Bartlett	Concern of unsafe working environment	<p>"Everyone we spoke with identified physical safety as a major issue at this facility...universally-cited safety issues involve problems with equipment"—cameras, door locks, and fire alarms</p> <p>Staffing inmate unit with one inexperienced officer for long shift – "regular practice that only one [CO] is in a housing unit per shift, with one other...in the picket position... The newer [COs] are inexperienced and unequipped to handle such an assignment and reported being fearful for their lives under these circumstances."</p> <p>"One [CO] said it took 12 minutes for help to arrive when she reported a serious incident</p>	Bartlett – p. 3-4	Ops.– Lane Blair to evaluate and address.

		<p>in the dorm and called for back-up."</p> <p>"the front entrance is an area of potential risk at night, when there is not a person regularly scheduled at the door. A [CO] could leave the building...and then return to the facility unchecked."</p> <p>"Staff members do not believe it is ethical for the company to put them at such risk, and their feelings add to the distrust of other company messages regarding ethics."</p>		
	<p>Leadership treats subordinates in disrespectful and demeaning manner</p>	<p>"Only a very few people...did not share the predominant view about the lack of respect and demeaning behavior by their immediate supervisors. We believe that these...are significantly impacting the ethical culture of this facility, and are generally putting CCA's operations and reputation at risk."</p> <p>"there is a fundamental environment of disrespect and regular use of demeaning language and treatment that have become normal, accepted behavior."</p> <p>"Those at the top" blamed the middle management, "Those in the middle blamed those at the top, as well as the [COs]," and</p>	<p>Bartlett – p. 3, 5</p>	<p>HR + Ops.-Lane Blair to evaluate and address</p> <p>Additionally, Ethics Office to address "respect" in future communications and trainings (CCA-wide)</p>

		COs "pointed to supervisors and senior leadership."		
		"heard from almost everyone...that the disregard for professionalism and respect starts at the top of the management chain with the Warden and cascades downward."		
	Staff are distrustful, and have well-founded fear of retaliation	<p>"strong level of distrust of the leadership team and reported instances of retaliation when staff have made complaints or raised concerns"</p> <p>"The level of distrust between staff and the leadership teams is untenable and further adds to the safety problems." "Many of the [COs] questioned whether they would receive support from their fellow [COs] and Supervisors should something occur while they are in a unit."</p> <p>"What stands out...at Bartlett were <i>actual instances</i> where retaliation had occurred when staff raised a complaint or concern."</p> <p>Warden maintained collection of wooden spoons (on mantel, next to "The CCA Way"). "Bartlett staff members get their names on a spoon if they 'stir the pot.'...This is the equivalent of maintaining a list of whistleblowers for retaliatory action."</p>	Bartlett – p. 3 – 4, 6	<p>Ethics Office address as CCA-wide education in 2016.</p> <p>Ethics Office also directly address with new Warden and Lane Blair.</p> <p>Ethics Office working on more robust non-retaliation policy?</p>

		"CCA needs to take immediate, affirmative steps to end the stifling of conversation and discourse, demand that leadership put an end to any form of retaliation against staff for speaking up and raising concerns, and foster a...culture...where speaking up is encouraged rather than punished."		
	Low morale and negative attitudes	<p>"Bartlett was no longer a good place to work."</p> <p>"a developing sense of apathy among the staff"</p> <p>"combination of low wages, abusive work environment and safety concerns was driving many to leave the facility"</p> <p>"For the [COs], this lack of effective communication and demeaning treatment has led to a silent animosity toward leadership. That animosity is shared by experienced officers and management members and runs very deep at this facility."</p>	Bartlett – p. 3, 5-6, 10	HR + Ops-Lane Blair to evaluate and address
	Contraband not effectively addressed	"heard that contraband is a major issue at the facility, but...little was being done to enforce or prosecute...sense of frustration that there are suspects but it appears to the [COs] that little is being done about it....Many felt that arresting and prosecuting	Bartlett p. 5, 9	Ops-Lane Blair to evaluate and address

		<p>perpetrators would send a strong message to staff."</p> <p>"some employees felt there would be little enthusiasm for cracking down on smuggling of contraband by staff, because such enforcement could jeopardize the contract by reducing staff to untenable levels."</p>		
	Poor staff communication	<p>Warden and leadership expended "little effort" "at communicating with the staff... Staff members also felt that when communications did occur, they were incomplete and/or untruthful."</p> <p>"regularly engaging smaller groups...could have a dramatic impact in improving communications"</p> <p>"Many employees said that communication would improve if senior managers, including the Warden, were more visible 'in the trenches'."</p>	Bartlett – p. 10	HR + Ops to evaluate and address
	New Warden is critical	<p>"The introduction of a new Warden at the facility is an excellent opportunity to address and improve the situation at Bartlett... selecting a Warden with the understanding and ability to address the people issues and challenges in a positive way will be a good start."</p>	Bartlett – p. 6, 9-10, 12	<p>Ops – Managing Director Lane Blair + VP Daren Swenson to select new Warden.</p> <p>New Warden to receive AMI's report re: the facility.</p>

		Consider establishing 'No Tolerance for Disrespect Policy'		
Florence (W. Koehn)	Ethical culture is strong	"ethical culture of the facility appears to be basically strong and consistent with the values communicated in the 'CCA Way.'" "leadership and staff generally care about doing the right thing and the Warden sets the right ethical tone for the facility."	Florence – p. 3, 7	Ethics Office + Ops: Evaluate how to utilize W.Koehn as teacher and leader for other facility leadership as re: Ethics.

		<p>Warden "truly does have an 'open door' policy"</p> <p>"Most...believe that the facility is doing a good job of ensuring compliance with all government agency requirements"</p> <p>"Adherence to inmate rights policies was articulated as a priority...the bar is set very high at [Florence] in this area"</p>		
	Low engagement scores	<p>"managers and supervisors do not regularly engage their employees in meetings and discussions, nor do they regularly disseminate information regarding corporate activities"</p> <p>"formal cascading communications, where the messages from [Warden's] meetings are disseminated to others, do not appear to be the norm"</p> <p>"Warden's initial engagement with the staff did not go over well," but "recent efforts are...a great improvement in the Warden's efforts to reach out to staff on a more personal level"</p> <p>"Warden has made a point of increasing his level of engagement with the staff, not all of the senior leadership embraces the value of and need for engagement."</p>	Florence – p. 4-6, 8	<p>HR + Ops (J.Schomig):</p> <p>Warden has expressed frustration with engagement scores; he would like help, tools, guidance, and resources to improve</p> <p>Warden is also pushing direct email communications for all staff, moving to requirement for staff to monitor their email.</p>

		"staff readily acknowledged that the Warden and other managers are making a real effort to be better engaged...and are continually making efforts to improve the overall culture"		
	Pay inequity	<p>"heard of some cases of pay inequity," including "senior leader reportedly paid less than some senior [COs]"</p> <p>"many of the office staff advised us that they have not received a pay raise in as many as 8 years."</p>	Florence – p. 4	HR + Ops to evaluate and address
	Supervisors not prepared for leadership	<p>"supervisors and managers...generally lack the requisite people management skills and leadership training...unqualified individuals are routinely promoted into supervisory roles"</p> <p>CCA U graduates "reported that their enthusiasm was dampened by a less than supportive reaction from their own managers following their return from the training when they tried to share and incorporate what they had learned"</p> <p>Warden has "started a process of adding a 'people criterion' to the managerial promotion interviews to ensure that the</p>	Florence – p. 5-6, 8	<p>HR - CCA-University: Continue roll-out, and improve support and understanding of it</p> <p>HR + Ops (J.Schomig): Work with Warden on efforts to identify and promote well-rounded leaders</p>

		new generation of leaders is selected not just on tenure, but on their skill in managing people."		
	Negative perceptions about corporate culture	"Although [Florence] staff generally believes that their facility ethical culture is strong, many did not share the same view about the corporate culture of CCA...believe that profitability has too much influence on decisions regarding facility staffing and the pressure to perform...has created some morale issues"	Florence – p. 6-7	Ops. to evaluate and address (as re: communications about staffing decisions and expectation). Ethics Office to expand positive CCA-wide communications.
	Leadership's handling of employee concerns – lack of confidentiality, inaction, and fear of retaliation	"most staff...are generally comfortable speaking with the Warden;" however, less "willing to speak up to some members of lower management because they fear...some form of retaliation." "repeated concerns about the lack of timely, consistent, and appropriate action when concerns are raised" – "general perception of inaction when issues are raised" "absence of feedback contributes to...reluctance to raise issues or concerns" "general perception that confidentiality does not exist"	Florence – p. 7, 10	Ethics Office address as CCA-wide education in 2016. Ethics Office also directly address with Warden Koehn and J.Schomig Ethics Office working on more robust non-retaliation policy?
	Overtime and staffing limitations	"a general perception...that important staffing decisions are made at the corporate	Florence – p. 9	

	are taxing on staff	level based on a profit motive without collaboration or input from the facility" "While the staff enjoy working the extra overtime, senior leaders are concerned that unreasonable overtime can lead to fatigue and ultimately facility safety risks. The [COs] agreed that this is not an uncommon occurrence."		
	Documentation falsification	"The most common type of misconduct identified...was the falsification of documentation"	Florence – p. 10	Ethics Office: Will distribute Ethics Brief on this topic and provide accompanying talking points for facilities' leaders, and address during upcoming trainings.
	Escalation of incidents from facility to FSC	"We believe that CCA should re-examine the protocols and criteria for elevating incidents of misconduct from the facilities to corporate, particularly in the area of data privacy breaches, falsification of documentation, etc."	Florence – p. 11	GCOI is presently drafting new "escalation" policy. Ethics Office to participate in its evaluation.

Hardeman	High staff turnover and short staffing	<p>"high turnover rate is a major impediment to developing a strong culture"</p> <p>"low hourly wage" is a top reason for turnover</p>	Hardeman – p. 3-4	HR + Ops to evaluate and address
	Disrespect and unkindness	<p>"almost universal chorus that the staff at Hardeman does not feel respected by their managers and supervisors. A lack of respect was cited as the primary reason that employees do not like their jobs and the primary motivator for looking to change jobs. These comments were pervasive and not isolated complaints"</p> <p>Include being "berated in front of inmates or on the radio"</p> <p>"it is very difficult to get a day off or to call in sick without disciplinary repercussions"</p> <p>Some situations "where the master scheduler or supervisors exhibited an almost cruel lack of empathy for the needs of the staff"</p>	Hardeman – p. 3-4	<p>HR + Ops.-Jason Medlin to evaluate and address</p> <p>Additionally, Ethics Office to address "respect" in future communications and trainings (CCA-wide)</p>
	Poor Leaders	<p>Concerned with "the qualifications and abilities of those chosen to leadership positions...who might not possess the necessary leadership and supervisory skills...evaluation of the selection criteria and process might be helpful"</p> <p>"selection and retention of leadership</p>	Hardeman – p. 6, 8	<p>HR + Ops. to evaluate and address</p> <p>HR-CCA University</p>

		<p>personnel should also be reexamined. Many spoke with us about a few leaders who they believe are the primary individuals who are driving poor morale...We believe that the senior leadership is aware of them, but due to staffing shortages might feel constrained..."</p> <p>"lack of leadership training that has been provided"</p> <p>Concerned that supervisors/managers were not aware of widespread morale issues and complaints "regarding a lack of respect and abusive behavior;" "the only conclusion we can draw...is that these managers are either not sophisticated enough to hear, see, and understand the impact of what is going on in front of them, or that their leadership skills are seriously lacking."</p> <p>Need "more active follow-through on these leadership principles through the ranks of the middle and first line managers, along with accountability for how these managers interact with their staff."</p>		
	Inexperienced staff	<p>"number of staff...where this is their first real job out of high school. For them, there are multiple challenges that serve as an impediment to a stronger ethical culture.... Lack the depth of personal experience and</p>	Hardeman – p. 5	HR + Ops to evaluate and address, including training needs

		<p>training to be able to handle caring for inmates"</p> <p>"Both managers and staff at Hardeman thought that additional on-the-job training could go a long way in better preparing these new employees for the realities...and preventing some of the high-risk behaviors which threaten the facility"</p> <p>"inability of younger staff to quickly adapt to a law enforcement based management system...has to adjust to the chain-of-command process and the very strict rules of compliance"</p> <p>"lack of a support system" for new COs; "many discussed the idea of a mentor"</p>		
	Staff have safety concerns	"number of the staff, particularly the less experienced [COs]...have concerns about their safety, particularly when left on a unit by themselves due to limited staffing and without any defensive weapons. They also don't believe that their managers will 'have their backs.'"	Hardeman – p. 4	Ops to evaluate and address
	Fear of retaliation	"the overwhelming and strikingly forceful feedback we received from the staff at all levels, is that they fear that they will be retaliated against if they raise any issue, report any concern, or identify any	Hardeman – p. 7	<p>Ethics Office address as CCA-wide education in 2016.</p> <p>Ethics Office also directly address with Warden Perry and Jason Medlin.</p>

		suspicious behavior to a supervisor. Some offered instances where they were retaliated against either subtly or directly... The principal reason cited...in not reporting issues is they believe they are not able to report anonymously and that they will be found out."		<i>Ethics Office working on more robust non-retaliation policy?</i>
	Lack of communication	"communication at Hardeman stalls at the middle management layers" COs reported instances of institutional change, and "the source of that information is from the inmates"	Hardeman – p. 7	HR + Ops to evaluate and address

Houston (W. Lacy)	Positive staff / leadership relations	<p>Warden + Exec. Team "meet each new employee within 24 hours... to establish a relationship"</p> <p>Warden and AWs "visit the units each day and are open and communicative with the Detention Officers"</p> <p>"Warden and [AWs] are approachable...they interact with staff"</p> <p>Regular staff-engagement efforts</p> <p>Staff feel "respected and appreciated by senior leadership"</p> <p>Warden has true "open door."</p>	Houston - p. 3-5	Ops-Managing Directors: Consider how can use these examples to improve other facilities' leaders.
	Strong ethical tone	<p>"Warden sets the ethical tone of the facility and expects high standards from each employee."</p> <p>"Staff commented that they all try to do the right thing at all times"</p>	p. 3-4	Ethics Office – Identify opportunities to include Warden Sloan in ethics-building efforts outside this facility.

		"Leadership team is professional and fair"		
	Pay stagnation and disparity	"complain that they have only had one pay raise in nine years and that new employees earn the same hourly wage"	p. 4	HR + Ops to evaluate and address
	Lower-level management is weak	They "need additional training," lack experience, knowledge, and leadership skills. "poor supervisors remain on the job and little is done about it."	p. 4, 7	HR + Ops to evaluate and address. HR – CCA-University
	General fear of retaliation, regarding lower-level management	"some of the staff are not willing to speak up to the lower levels of management because they fear that if they do so, they will be the subject of some form of retaliation"	p.5	Ethics Office address as CCA-wide education in 2016. Ethics Office also directly address with Warden Lacy and Jason Ellis. <i>Ethics Office working on more robust non-retaliation policy?</i>

Lake Erie (W. Sloan)	Ethical culture is fundamentally sound		Lake Erie p. 3	Ethics Office – Identify opportunities to include Warden Sloan in ethics-building efforts outside this facility.
	Staffing shortages and high staff turnover	<p>Staff "expressed concern about the problems that the company is having with staff retention"</p> <p>Overtime leads to staff "becoming 'burned out,' which...can lead to apathy and poor performance"</p> <p>"lack of stability in the workforce interferes with leadership's ability to develop those strong bonds with the staff"</p> <p>"Everyone...at the facility recognizes the impact that the high turnover is having on ethical culture."</p>	<p>Lake Erie p. 3</p> <p>Lake Erie p. 3</p> <p>Lake Erie p. 4</p> <p>Lake Erie p. 5</p>	HR + Ops to evaluate and address

		"appears...that the team is working to address...staffing shortages, through ongoing and expanded recruitment efforts"	Lake Erie p. 7	
Staff experience lack of respect and professionalism by middle management		"staff spoke positively about the Warden and the new leadership team"	Lake Erie p. 3	HR + Ops.-Melody Turner to evaluate and address
		However, staff "cite a general lack of respect and demeaning language by their supervisors"	Lake Erie p. 3	Additionally, Ethics Office to address "respect" in future communications and trainings (CCA-wide)
		COs' "complaints with leadership are mostly focused on one of the Assistant Wardens, as well as with some of the Sergeants and Captains.... many felt that it was because these...were not prepared or sufficiently trained for the leadership positions"	Lake Erie p. 7	
		"complaints about lack of respect were not universal....good number of staff [said] that people are friendlier at this facility"	Lake Erie p. 4	
		"However, the greater number of [COs]...described their experiences of being demeaned and belittled, occasionally in front of the inmates."		
		"several of the supervisors are rougher on the [COs] than others"	Lake Erie p. 4	
		"some suggested that a Zero Tolerance Policy might be in order to compel behavior...dignity, respect, and	Lake Erie p. 4	

		professionalism"		
	Contraband is ongoing problem	<p>"Many of the new hires are terminated almost as soon as they...are put on the units...typically for bringing contraband...and/or establishing relationships with the inmates."</p> <p>"...unusually high disciplinary rates for contraband and 'establishing'..., the training programs dealing with these issues should be revisited" (examples suggested)</p>	<p>Lake Erie p. 4</p> <p>Lake Erie p. 5</p>	HR + Ops to evaluate and address
	Staff frustrated with last-minute and unabating work demands, inability to schedule their personal lives	<p>"overtime and hold over demands have impacted their family and personal lives and that there is little appreciation for their efforts. Because of the scheduling, they cannot make plans and even long planned vacations get interrupted... it appears to them that management has no consideration for them or their families..."</p> <p>"often a lack of coordination and/or communication of training or other compelled activities."</p>	<p>Lake Erie p. 5</p> <p>Lake Erie p. 6</p>	HR + Ops to evaluate and address
	Retaliation fears among some staff	Although staff "feel that they could speak freely with the Warden and some others on the senior leadership team," COs "fear that	Lake Erie p. 6	Ethics Office address as CCA-wide education in 2016.

	<p>they will be retaliated against if they raise any issue, report any concern, or identify any suspicious behavior to a supervisor"</p> <p>"a few specific instances where they were retaliated against either subtly or directly"</p> <p>These were not universal concerns. "Many, particularly in the leadership and management teams, did not express any hesitation in raising issues."</p> <p>"the communications and reporting issues...are most noticeable at the middle and lower management levels"</p>	<p>Lake Erie p. 6</p> <p>Lake Erie p. 6</p> <p>Lake Erie p. 6</p>	<p>Ethics Office also directly address with Warden Sloan and Melody Turner. Communications by Facility Leadership – Warden and ADO staff</p> <p>Ethics Office working on more robust non-retaliation policy?</p>
Improve communication with staff	<p>"many felt that communications could be improved even further because many staff do not read the bulletin board and feel disconnected and isolated because of the stations they cover"</p>	<p>Lake Erie p. 6</p>	<p>HR + Ops to evaluate and address</p>
Positive relations with, and perception of, the Warden and most facility leaders	<p>"staff spoke positively about the Warden and the new leadership team"</p> <p>Staff "feel that they could speak freely with the Warden and some others on the senior leadership team"</p> <p>"communications with the Warden at their regular meetings are open, which creates a collaborative environment"</p>	<p>Lake Erie p. 3</p> <p>Lake Erie p. 6</p> <p>Lake Erie p. 6</p>	<p>No action needed.</p>

		<p>"leadership team...for the most part, is viewed in a positive light"</p> <p>Almost everyone "acknowledge[d] that they trust the Warden, and that he truly has an open door policy."</p> <p>Warden engages with staff, and sincerely expresses appreciation</p>	<p>Lake Erie p. 7</p> <p>Lake Erie p. 7</p> <p>Lake Erie p. 7</p>	
	Improved staff-inmate relations	<p>"Use-of-Force Reports have dropped significantly... informed that... were attributed to staff using effective communications with inmates instead of force"</p> <p>"Staff informed...they feel well prepared for handling inmate's rights and that incidences of violence between inmates were down."</p>	Lake Erie p. 8	No action needed.
	Staff concern with having one staff person running a unit	"Some felt unsafe, unsupported and often isolated in those circumstances."	Lake Erie p. 8	Ops. to evaluate and address